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October 24, 2002

USDA Forest Service
Attn: NFS – EMC Staff (Barbara Timberlake)
Stop Code 1104
1400 Independence Avenue, SW
Washington, D.C. 20250-1104

Re: Notice of Administrative Appeal of the Chugach National Forest Revised Land and Resource Management Plan and Final Environmental Impact Statement

Dear Ms. Timberlake and NFS – EMC Staff:

The Alaska Quiet Rights Coalition (AQRC), pursuant to the Forest Service Regulations contained in 36 C.F.R. part 217, submits the following administrative appeal of the Chugach National Forest Revised Land and Resource Management Plan (Revised Plan) and Final Environmental Impact Statement (FEIS) issued by Dennis Bschor, Regional Forester, and published on July 26, 2002. See 67 Fed. Reg. 48894 (July 26, 2002). This appeal concerns the following decisions and flaws in the Plan and FEIS: the failure to adequately protect Natural Quiet; the failure to allocate opportunities for non-motorized and motorized recreation in a fair and balanced manner; the adoption of a definition of “traditional activities” that is inconsistent with the Alaska National Interest Lands Conservation Act (ANILCA); and the failure to adequately describe and analyze the individual and cumulative effects of the use of motorized recreational vehicles on the Forest. Our December 14, 2000 comments on the Draft Plan (“AQRC Comments”), attached to this letter and incorporated herein by reference, supplement our appeal arguments and allow us to avoid some duplication and submit a more concise appeal. We have also attached an analysis of the written comments on the draft plan as they pertain to natural quiet and the need to restrict the use of motorized recreational vehicles in order to provide high quality non-motorized recreational opportunities on the Chugach (“Comments Analysis”).

The Alaska Quiet Rights Coalition focuses on the social impacts of motorized recreational vehicle use, and is dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, wildlife, visitors, and future generations.

I. The Plan fails to adequately protect natural quiet.

A. Natural quiet is an intrinsic and essential component of the Forest.

Natural quiet, and the opportunity to hear and enjoy natural sounds—a raven's wing beats, falling snow, the wind in the trees—is an essential natural resource, and as much a part of the natural world as fish, wildlife, trees, shrubs, wildflowers, scenic beauty, wilderness, or clean air and water. Its presence is critical to our physical, mental, emotional and spiritual health. Wildlife depends on it in ways that we are only now beginning to learn. Until very recently, natural quiet was taken for granted. The idea that it could be lost was inconceivable. Now, however, although there are still quite a few places (in Alaska, the rest of the country, and the rest of the world) that look like they did 200 years ago, there are almost no places that sound like they did just one or two decades ago.

B. The Forest Service has failed to adequately protect natural quiet.

The Forest Service has a responsibility to maintain natural quiet on and over the Forest's lands and waters in those areas where it still exists, and to restore it to substantial portions of the many areas where it has been lost (94% of those who expressed an opinion in written comments on the draft plan supported the protection of natural quiet (Comments Analysis)). The Service has failed to discharge this responsibility.

The Chugach appeared to be getting off to a good start. For example, it was probably the first forest in the nation to recognize the intrinsic value of natural quiet and designate it as an "Interest" that had to be addressed in the Revised Plan. Also a probable first, it established a Developed Recreation-Reduced Noise prescription to minimize noise at facilities like campgrounds. Unfortunately, the final Revised Plan failed to fulfill this early promise. Without even attempting to explain why, the Service deleted the Developed Recreation-Reduced Noise prescription; this prescription should be retained, and should be applied at least to Coeur d'Alene Campground, Grandview, and Primrose, as it was in the Preferred Alternative (interestingly, the prescription is nevertheless listed in the Executive Summary (p. 5)—suggesting that it was hastily removed from the plan at the last minute and not all of its traces were erased). Additionally, the Revised Plan provides for so much motorized recreational use that even maintaining, let alone restoring, natural quiet will be impossible.

1. Motorized recreational vehicles and equipment are allowed on far too many areas of the Forest.

Snowmachining will be allowed on about 87% of the Forest (computed from FEIS, Table 3-68, p. 3-410)—and even in areas where recreational snowmachining has been prohibited, ridgetops separating these closed areas from open ones are open to snowmachining (Revised Plan, p. 3-35), basically nullifying the benefit of topographical screening and making allegedly quiet areas noisy. Similarly, several of the relatively few areas that are closed to snowmachining are open to heli-skiing, again largely nullifying the benefit of the snowmachine closure (see, e.g., Revised Plan, p. 4-93). The Chugach in the winter should be managed on a closed until open policy, as it is in the summer; additional winter closures should be enacted in order to create a fair and balanced

management scheme; snowmachining should not be allowed on ridgetops above closed areas; and heli-skiing should not be allowed in areas closed to snowmachining.

Commercial helicopter skiing (subject to permit) in the **winter** (some of the areas are open only before 2/15 or 3/31) has been authorized on about **82%** of the Kenai Peninsula and Turnagain Arm and **24%** of Prince William Sound (Revised Plan, Table 4-3, p. 4-94) (the figures in the table for the Copper River Delta seem to be grossly inaccurate (see, e.g., in this table, the allegedly zero acres for the Delta under the "Open to All Motorized Use" direction), although it appears from the Winter Motorized Recreation Access map that a **very large percentage** of the Delta is open; a number of the areas in the Sound would be available only after Congress has acted on the Forest Service's recommendations for the WSA). Areas open to heli-skiing should be reduced substantially on both the Kenai and Arm and the Delta, and no new permits should be granted until a comprehensive EIS has been completed on helicopter skiing on the entire Forest.

Commercial helicopter landings (subject to permit) in the **summer** have been authorized on about **36%** of the Kenai Peninsula and Turnagain Arm and about **37%** of the Copper River Delta (Revised Plan, Table 4-4, p. 4-97). These percentages are excessive and should be reduced.

The Forest Service **refused** to assert **jurisdiction** over the submerged lands and most of the **waters** of the Forest. Consequently, **jet ski** use can occur anywhere on the Forest (the Service refused to address these highly obtrusive watercraft at all). **Airboats**, which are also highly obtrusive, are allowed anywhere on the Forest as well (as are **jetboats** and **motorboats**), except when operated "outside of established water bodies or flowing channels" (Revised Plan, p. 4-91). The Service should assert jurisdiction over these waters, should ban jet skis and airboats, and should responsibly manage other watercraft. (Regarding the jurisdiction issue, please see the appeal submitted by Trustees for Alaska, which we incorporate herein by reference.)

Fixed-wing airplanes can land nearly anywhere on the Forest (see, e.g., Revised Plan, pp. 3-14, 3-41), for example, even on all of the remote lakes where backpackers who have hiked several hours to get there are camping. The Forest Service should regulate these airplanes where appropriate (for example, to provide at least a few refuges for backpackers), not ignore them.

Explosives and small motorized equipment are allowed for recreation maintenance, construction, and reconstruction projects even in areas managed as Wilderness, such as the Wilderness Study Area and Recommended Wilderness (Revised Plan, pp. 4-14, 4-18). These should be allowed only when they are absolutely necessary, not just for convenience's sake.

2. Too few remote areas are managed for natural quiet.

The provision of areas for natural quiet (the term, incidentally, is not defined in the Glossary) is focused on "locations with relatively easy access" (Revised Plan, p. A-2). That's both disappointing and ironic. Although one would certainly hope to be able to find natural quiet and enjoy natural sounds in relatively accessible areas, it's at the more remote, wilder areas, the ones that are not a focus for the Service, where one's expectations would be highest and the disappointment at not finding natural quiet would be greatest. Opportunities to find natural quiet should be common, and they should be available in both relatively accessible and more remote locations; this would be consistent with the goal to provide a range of recreation settings (Id.). The Revised Plan should provide more opportunities for remote quiet recreation, for example with a split winter season at the Twentymile and at Lost Lake.

3. To say that the Primitive and 501(b)(1) prescriptions address natural quiet is misleading.

Two prescriptions are said to address the natural quiet Interest: Primitive and 501(b)(1). The Primitive prescription truly does address the natural quiet Interest—it's the only prescription that prohibits all motorized use. Unfortunately, it is applied to only one small area (11,750 acres) that comprises just 1/5 of 1% of the Forest. As for the 501(b)(1) prescription, to say that it addresses the natural quiet Interest is hardly accurate since it explicitly (that is, not just under the flawed "traditional activities" definition; see below) allows recreational snowmachining; this reference to the natural quiet Interest should be deleted.

4. The Revised Plan incorrectly defines "traditional activity" to include recreational snowmachining.

ANILCA provides for the use of snowmachines, airboats, and airplanes for "traditional activities" and for travel between villages and homesites, subject to reasonable regulations, including prohibition (Section 1110(a)). The Forest Service, however, has adopted a policy allowing the use of snowmachines for recreational purposes in areas managed as Wilderness that is inconsistent with that section and that also violates the Wilderness Act (see below). This interpretation unnecessarily, illegally and significantly reduces the number of areas on the Forest where natural quiet would otherwise be protected—as it is in the rest of the country—from the artificial noise of often extensive recreational snowmachining activities (this flawed definition also deprives the Forest Service of a tool—non-motorized Wilderness—available everywhere else in the country to provide non-motorized recreation opportunities (see discussion in III. below)).

5. The Revised Plan fails to adequately manage the subsistence use of motorized vehicles.

A separate section of ANILCA provides, for subsistence purposes, for the use of motorized vehicles traditionally employed for such purposes by local residents, again subject to reasonable regulation (Section 811(b)). We support this concept. However, there is nothing in the Plan or FEIS that suggests that the Forest Service intends to fulfill

its responsibility to oversee and regulate these uses (see, e.g., Revised Plan, p. 3-41, 4-91), to the potential detriment of both natural quiet and other Forest resources. The Service needs to do so.

6. The Chugach's soundscape needs to be researched and monitored.

Finally, a glaring hole in the list of Information and Research Needs (Revised Plan, pp. 5-19 – 5-23) is the need to undertake soundscape research on the Forest. Although the soundscape has already been significantly degraded, at least a current baseline could be established that could then be monitored for changes. An appropriate model—in Alaska—is the work now being done at Denali National Park.

II. The Revised Plan fails to allocate opportunities for non-motorized and motorized recreation in a fair and balanced manner.

A. The overall balance of recreational opportunities on the Forest is still substantially skewed in favor of motorized recreation.

Motorized recreation—if one looks at the land, waters and airspace, all four seasons, and both private and commercial uses—dominates the Chugach (see I.B.1. above). The Revised Plan allows recreational snowmachining on 87% of the Forest (Id.), and even on 82% of the Kenai Peninsula and Turnagain Arm, where the use and conflicts are greatest (FEIS, Table 3-68, p. 3-410). Helicopter skiing is allowed on 82% of the Kenai and the Arm (see I.B.1. above). Summer helicopter landings are allowed on more than a third of the Kenai/Arm and the Copper River Delta. Jet skis, airboats, jetboats, and other powerboats are allowed on all of the Forest's waters (Id.). Fixed-wing airplanes can land virtually anywhere.

These decisions are hardly an adequate response to the 80%, 83%, 90%, 94%, and 92% of the written commenters on the draft plan who expressed an opinion who supported restrictions on snowmachines on the entire Forest, snowmachines on the Kenai and Arm, heli-skiing, jet skis, and airboats, respectively.

Nor do they correspond to the existing, and estimated future, use of the Forest by non-motorized and motorized users. For example, in 1998 there were 189,967 visits to the Kenai Peninsula by cross-country skiers, and 159,794 visits by snowmachiners (FEIS, Table 3-55a, p. 3-306). Furthermore, statewide, of all of the recreational activities analyzed (including cross-country skiing and snowmachining), the smallest future increase in participation is predicted for snowmachining (FEIS, p. 3-332).

Finally, the Kenai Peninsula and Turnagain Arm are to be managed to “accommodate high levels of human use” (Revised Plan, p. 3-14). This is neither a balanced nor a necessary decision, and one that effectively leads to a reduction of opportunities for non-motorized recreation (as well as the protection and restoration of natural quiet). This management direction is presumably responsible for the failure to recommend a single

acre as Wilderness (even the 1984 plan recommended Snow River for Wilderness), and for the substantial favoritism afforded to motorized recreation.

The potential for high levels of use is certainly there, but the management of Chugach State Park (CSP) provides a model for a different way to manage such use than the one the Forest Service chose. CSP is directly adjacent to 250,000 people, yet it includes designated Wilderness, and winter recreation opportunities are balanced approximately 50-50 between non-motorized and motorized. The Forest Service should provide both a better balance on the Chugach, and recommend Wilderness on the Kenai and Arm so that the Chugach can provide accessible Wilderness (as do other forests nationwide), not just Wilderness that requires a significant investment of both time and money to visit.

B. On the Kenai Peninsula and Turnagain Arm the most desirable winter recreation sites are unfairly allocated to motorized recreation.

Although choosing the most desirable winter recreation sites on the Kenai and Arm is somewhat subjective, many people would agree that those locations include the Twentymile, Resurrection Pass, Johnson Pass, Lost Lake, and the South Fork of Snow River. In none of those areas has a new high quality non-motorized opportunity been provided in the Revised Plan.

Bench and Divide Creeks adjacent to Johnson Pass have been closed to snowmachining, but they are open to heli-skiing—nullifying the benefit of the snowmachine closure.

Under the Preferred Alternative in the draft plan the eastern portion of Lost Lake would have been closed to snowmachining after March 31, but that partial closure was deleted in the Revised Plan.

Finally, the Twentymile under the draft plan Preferred Alternative was to be closed to snowmachining in alternate years; in the Revised Plan, the first four miles of the valley (the least desirable portion) are to be closed to snowmachining—but with an unscreened motorized corridor cutting through it—again, effectively nullifying the benefit of the closure (although it isn't much of a benefit in the first place).

One of the rationales for the Twentymile change is that split seasons are unpopular. That conclusion, however, cannot be substantiated. It's true, for reasons that we believe are illogical, that the alternate year method is unpopular with some (perhaps many) members of the snowmachine community. That cannot be said with regard to split seasons, however (like the one for the Resurrection Pass area). Most snowmachiners favor split seasons over other forms of closures (like full closures), although they would like to flip-flop the seasons so that they would have an opportunity, every other year, to ride during the late winter, early spring season (at Resurrection such a flip-flop was decided against for wildlife protection reasons). In fact, at a Forest Service meeting on August 9 to answer questions the public might have about the ROD, Revised Plan, and FEIS, two leaders of the snowmachine community said that they didn't like the four mile

closure/motorized corridor provided for the Twentymile in the Revised Plan and would prefer a split season.

Consequently, the only high quality non-motorized opportunity provided in the Revised Plan for any of these five most desirable areas is the long-standing split season at Resurrection—no new high quality opportunities have been added. Under the Revised Plan 4 ½ of five of the most desirable areas have been allocated to snowmachining, and only the existing ½ to non-motorized recreation. Quiet recreationists continue to be treated like second-class citizens, receiving what remains after the most desirable areas have been allocated to motorized recreation.

The Forest Service does deserve some credit, however, for its attempt to provide at least some minor compensation for the non-motorized losses that occurred between the Preferred Alternative and the Revised Plan. In its Revision Newsletter, widely distributed prior to the end of the comment period, and at the public meetings held subsequently to further explore the winter non-motorized/motorized recreation issue on the Kenai and the Arm, the Service specifically asked for comment on possible closures at Carter/Crescent, Russian Lake, Fresno Ridge, and elsewhere (see, e.g., AQRC Comments, p. 10). These areas are closed in the Revised Plan, providing imperfect (for example, there are two accesses to the Carter/Crescent area, and one of them, the Carter Lake Trail, is quite steep, and the other, the Crescent Lake Trail, is not recommended by the Forest Service for winter travel) compensation to non-motorized recreationists for the loss of the most desirable areas. Although imperfect, these closures should be retained, and the Twentymile and Lost Lake should be managed to provide high quality opportunities to both non-motorized and motorized recreationists with a split-season (preferred to alternate years by the snowmachine community) time-share.

C. Several of the rationales on which many of the winter recreation allocation decisions were based are improper and resulted in reduced allocations for quiet recreation.

1. The Forest Service relied far too heavily on existing use patterns to make winter recreation allocation decisions on the Kenai Peninsula and Turnagain Arm.

The public was told earlier in the process, and the Record of Decision (ROD) confirmed, that a major factor in making winter non-motorized/motorized recreation allocations on the Kenai and Arm was the pattern of existing use ("I wanted to maintain key winter motorized access where it is currently occurring" (ROD, p. 24)). Unless used cautiously, this is an inappropriate criterion since it fails to adequately consider the substantial impact that displacement has had on this region and therefore unfairly favors the dominant, displacing form of recreation, motorized use.

Areas like Lost Lake, and Johnson Pass, used to be "key winter" non-motorized recreation areas until snowmachining increased substantially in those areas and forced out non-motorized users who were no longer able to have an enjoyable experience because of the incompatible, conflicting use (AQRC Comments, p. 5). While many

snowmachiners do not acknowledge that their noisy and otherwise high-impact sport is incompatible and conflicts with quiet recreation and other quiet needs (like those of home and cabin owners), the Forest Service, like all land managers, should understand this (although how well the Chugach managers actually do understand it is unclear; at FEIS, p. 3-358, the discussion refers to "perceived" incompatibility by "some," especially non-motorized, users; in fact, the incompatibility is all too real, and it exists for the vast majority of quiet recreationists). Land managers across the country have wrestled for several decades with this fundamental recreation conflict. Additionally, the Service understands that displacement has occurred on the Chugach (Id.) although, somewhat tellingly, it fails to define it in the Glossary.

However, despite acknowledging the displacement problem, the Forest Service grossly underestimates its extent: "there has been a certain amount of displacement" (Id.). In fact, displacement has been extensive. There's a very good and obvious reason why, for example, there are very few cross-country skiers these days at Lost Lake and a great many at Turnagain east and Manitoba Mountain. Skiers have been displaced from Lost Lake and other motorized areas and have flocked to the few areas that were open under the 1984 plan—such as Turnagain and Manitoba.

Yet the Forest Service has made no effort to analyze this critical issue, either through social surveys of present and potential non-motorized users of the Chugach as to where on the Forest they would like to be provided with high quality opportunities, or by a review of the recreational literature on the subject; this has to be done. Instead, initial Revised Plan decisions were based on existing use patterns, not on which areas are suitable for particular types of recreation, and would be desirable should the Service provide a high quality opportunity in the area (that is, for non-motorized recreationists, an area closed to both snowmachining and heli-skiing)(see, generally, AQRC Comments, p. 8). The FEIS specifically acknowledges that two recreation studies discussed in the document "do not integrate the concept of quality of experience into demand analysis" (FEIS, p. 3-324).

2. The Forest Service's description of existing winter recreation opportunities in the region is inaccurate.

Another Forest Service rationale for greatly favoring winter motorized use on the Kenai and Arm was that such opportunities were limited elsewhere in the region (FEIS, pp. 3-376, K-19). This is wildly inaccurate. A 1996 study by the State Division of Parks concluded that of the 34 million acres of Southcentral Alaska state and federal public land analyzed less than 5% were closed to snowmachining. In particular, the FEIS says that "much of the half million acre Chugach State Park (CSP) is closed to motorized use" (Id.). This is misleading. CSP is one of the few areas in the region with a balance of opportunities for non-motorized and motorized use. Although 83% of the acreage is closed, of the approximately one dozen accessible valleys or areas, half are open to snowmachines, and half are closed. The FEIS says that Kenai Fjords National Park and the Kenai National Wildlife Refuge have "limited winter motorized access." In fact, the 1996 study, which we believe is still accurate, indicates that none of the 573,000 acre

Park, and only 37% of the 1,970,000 acre Refuge, are closed to snowmachining. Although we disagree strongly with the Park and Refuge allocation decisions, they demonstrate that the FEIS is not accurate and that the Chugach, if it was seeking to make allocations that, in the context of the whole region, were fair and balanced, should have closed far more areas to snowmachining than it did in the Revised Plan.

D. The Forest Service has failed to provide an adequate balance of relatively accessible and more remote winter opportunities for quiet recreationists.

Just as it did with regard to natural quiet, the Forest Service has chosen to provide quiet recreation opportunities primarily "near existing roads" (Revised Plan, pp. 3-15, A-2), and in doing so has failed to provide adequate remote quiet recreation opportunities. In fact, non-motorized recreationists, just like motorized ones, desire a range of opportunities, from beginner to expert, and from accessible to remote. Opportunities are already available in many places for easily accessible recreation (such as the municipal ski trails in Anchorage). What the 1,173,000 acres of the Chugach on the Kenai and Arm can uniquely offer are more remote, wilder settings—but the great majority of these settings have been unfairly reserved for the motorized uses that have displaced quiet recreationists. Allocating Resurrection Pass for part of the season, and the Carter/Crescent area, to quiet recreation, hardly represents a fair allocation of the remote, wilder, truly Alaskan locations within a more than one million acre area of the Forest—especially, perhaps, when some of these allocations could have been accomplished with split seasons that allow all recreationists to enjoy their preferred winter sport for a substantial portion of every year. More remote quiet recreation opportunities should be provided, such as split seasons at the Twentymile and Lost Lake.

E. The benefits to quiet recreation of several areas closed to snowmachines have been lost as a result of inconsistent and improper decisions.

The major social purpose of closing areas to snowmachining is to provide non-motorized recreationists with a quiet place to recreate that is free of the noise and other impacts of motorized recreational vehicles. Those benefits are lost if the Forest Service fails to take a comprehensive look at the closed areas and allows helicopter skiing (as it did at Bench/Divide Creeks, Winner Creek, and Crow Pass), a motorized corridor (as it did for the Twentymile), or snowmachining on the ridgetop above a closed valley (Revised Plan, p. 3-35). Snowmachine noise carries for long distances, including from above. We've learned in recent years that non-motorized areas that aren't topographically (or temporally) screened from snowmachines or other motorized recreational vehicles don't work. At Turnagain Pass, where the two uses are not screened, the increase in snowmachining, combined with the recent popularity of high-marking (the noise from high on the hill is easily heard across the highway), have made Turnagain east far less desirable than formerly, and a poor model for allocation decisions. Again, snowmachining should not be allowed on ridgetops above closed areas, and heli-skiing should not be allowed in areas closed to snowmachining.

III. The Forest Service has adopted a definition of "traditional activities" that is inconsistent with ANILCA.

ANILCA provides for the use of snowmachines, airboats, and airplanes for "traditional activities" and for travel between villages and homesites, subject to reasonable regulations, including prohibition, to protect resource values from the harmful impacts of these modes of transportation (Section 1110(a)). The Forest Service, however, has adopted a policy allowing the use of snowmachines for recreational purposes in areas managed as Wilderness that is inconsistent with that section and that also violates the Wilderness Act (FEIS, Glossary-51). This policy is both illogical and illegal. The Service should follow the lead of its sister agency, the National Park Service (NPS), and adopt the definition NPS adopted for the Wilderness core of Denali National Park that does not include recreational snowmachining as a traditional activity. While the Forest Service policy was adopted without either a meaningful environmental analysis or public participation, the Park Service regulatory process included both—and enjoyed the support, both in Alaska and in the rest of the country, of more than 90% of the people who commented. Furthermore, the Forest Service should have considered an alternative that recommended Wilderness that conforms to the Wilderness Act and to the Park Service's regulation and does not allow recreational snowmachining.

Snowmachines and other motorized vehicles are not allowed on lands managed as Wilderness in the lower 48. Why did the Congress make a special, narrow exception for Alaska?

Alaska is truly different than the rest of the country in two very important ways. First, Alaskans, especially Native people, still engage in a viable subsistence economy conducted in part with the use of snowmachines. Second, many villages and homesites inside a number of our large federal conservation units are not accessible by road, and are regularly accessible, as a practical matter, only by the use of motorized vehicles. Subsistence and roadless travel between villages and homesites are truly traditional Alaskan activities that are unique to the State and deserve appropriate protection.

But when it comes to activities like recreational snowmachining, as opposed to using snowmachines for unique utilitarian purposes, Alaska is no different than places like Montana or Idaho. Recreational snowmachiners in Anchorage, Wasilla, or Kenai generally do exactly what is done in Missoula or Boise: they load their machines onto their truck or trailer, drive up the highway, unload at a pullout, and spend the day or weekend in the backcountry enjoying their preferred sport.

So why would Congress mandate (although it's a qualified mandate) that a recreational use be allowed in Alaskan Wilderness that is prohibited in Wilderness in the lower 48? Wouldn't it be more logical to provide greater, rather than less, protection in Alaska, which is valued not just nationally but internationally for its exceptionally wild character? The Forest Service should provide the lands it manages as Wilderness with the level of protection they deserve rather than less protection than that provided for the generally tamer lands in the lower 48. Furthermore, the Chugach is not as remote and inaccessible

as many of Alaska's federal lands. The Kenai Peninsula and Turnagain Arm, in particular, where most of the snowmachine conflicts presently occur, is easily accessible by road; snowmachine access is hardly necessary. As for the rest of the Forest, access to the land by powerboat is clearly adequate. The Chugach Wilderness, and its users, deserve at least the same protection from "growing mechanization" (16 U.S.C. Section 1131(a)) that is afforded to land managed as Wilderness everywhere else in the country.

A strong suggestion that there is something seriously flawed with the Forest Service's definition is the fact that certain of the areas managed according to an administrative prescription provide more protection for natural quiet and more opportunities for non-motorized recreation than lands managed as if they were congressionally designated Wilderness, which are open to purely recreational motorized uses under the Forest Service's incorrect definition of "traditional activities."

Finally, allowing recreational snowmachining in lands managed as Wilderness, as will happen under the Forest Service's flawed definition of "traditional activities," will result in the development of a constituency that will make it virtually impossible politically to obtain their inclusion in congressionally designated Wilderness. This will violate the legal requirement that the Forest Service manage such lands so as to maintain their potential for inclusion in the National Wilderness Preservation System.

(Regarding the traditional activities question generally, please see also the more detailed discussion in the appeal submitted by Trustees for Alaska, which we incorporate herein by reference.)

IV. The Revised Plan and Final Environmental Impact Statement fail to adequately describe and analyze the individual and cumulative effects of the use of motorized recreational vehicles on the Forest.

A. The Revised Plan and FEIS inaccurately and misleadingly state and suggest that the Chugach will be managed to protect its wild and natural character.

1. The prescription descriptions in the Revised plan are very misleading and result in an underestimation of the effects of motorized recreational vehicles on the Forest.

The Record of Decision says that the Revised Plan will "maintain the wild character" of the Forest (ROD, p. 3). The dictionary definition of "wild" includes the ideas of the "natural" and the "primitive" (the Forest Service doesn't appear to define "wild" in the Revised Plan or FEIS, although it says, belatedly, in the ROD, that "wild character" refers to the generally undeveloped quality of the Forest" (ROD, p. 5)—an unreasonably narrow and esoteric definition). Lands with the Wilderness Study Area and Recommended Wilderness prescriptions are to be managed to maintain the existing wilderness character (Revised Plan, pp. 4-12, 4-16). Lands with the 501(b)(1) prescription, another so-called Category 1 prescription, are to be managed to retain their wild and natural character (Revised Plan, p. 4-25). Dictionary definitions of "natural"

include "what is found or expected in nature," and "existing in nature...not artificial or manufactured."

Most of the Category 1 and 2 prescriptions (the most protective), which cover about 96% of the Forest, include some variant of most or all of the following: ecological processes, largely unaffected by human activity, dominate this area; the area will provide (outstanding, good, no modifier) opportunities for solitude, quiet, and isolation when traveling cross-country; scenery will be natural in appearance; and people should expect to use primitive skills (Revised Plan, Chapter 4). There are innumerable other examples in the two documents of very similar assertions.

This sounds terrific, but the reality will be very different because of the extensive motorized recreational vehicle use (snowmachines, ATVs, jet skis, airboats, jetboats, other powerboats, helicopters, fixed-wing airplanes—and who knows what else the future might bring), both private and commercial, that is allowed and will occur, at all seasons, on the lands and waters of the Forest, as well as above it (see I.B.1. above). The words in these documents are not used according to their plain and common meanings, and they become very misleading, resulting in a significant underestimation of the individual and cumulative effects of the use of motorized recreational vehicles on the Chugach.

What's wild and natural about these motorized vehicles? What definition of wilderness character includes the noise, exhaust, tracks, crowds, etc. that will result from these motorized uses? Isn't this significant human activity? Won't it affect ecological processes? How, faced with these uses, many of which will not be restricted to roads or trails, will a person find opportunities, whether outstanding or not, for solitude, quiet, and isolation? Is a snowscape natural in appearance when virtually entire valleys and hillsides, all the way up to the ridgetop, are tracked up by recreational snowmachines? Is driving a snowmachine or a jet ski a primitive skill?

Not only are the narrative descriptions of the prescriptions misleading, but the Activities Tables are as well. A good example is the second most protective prescription, Wilderness Study Area Management Area (Revised Plan, p. 4-13). Looking at this Activities Table, one would think that these lands would be quiet and uncrowded. Non-motorized recreation is a Yes for both summer and winter. The only motorized access category is Administrative and Permitted Motorized Access, and this is Conditional. This makes it appear as if the area will be managed for non-motorized recreation. But what the table fails to disclose is that recreational snowmachining is allowed, as well as motorized access for subsistence.

The draft plan table does a far better job of representing the prescription, with categories for both summer and winter motorized recreation, and for motorized access for subsistence—but these are deleted in the Revised Plan, leaving the misleading impression that the WSA will be free of the effects of motorized vehicles except for presumably rare administrative and permitted uses.

We acknowledge that the separate discussion of Motorized Recreation Access (Revised Plan, p. 4-91 – 4-97), and the summer and winter motorized recreation maps, are very helpful. But they should have been employed in addition to, rather than as a substitute for, an accurate and informative narrative and activities table description of the prescriptions.

Finally, the Recreation Opportunity Spectrum (ROS) for the WSA is said to range from Primitive to Semi-primitive Nonmotorized (Revised Plan, p. 4-12). Since SPN does in this instance mean what it says, and since Primitive is a more protective category, one is again led to believe that there will be no recreational motorized vehicle use—which is in fact not the case since recreational snowmachining will be allowed.

2. The Recreation Opportunity Spectrum discussions and analyses in the Revised Plan and FEIS are misleading and result in an underestimation of the effects of motorized recreational vehicles on the Forest.

In innumerable ways the use of the Recreation Opportunity Spectrum (see also immediately above) makes it appear as if the Forest will be more natural and wilder than it actually will be under the Revised Plan.

The Revised Plan explains the ROS system at pp. B-29 – B-31 (Appendix B is the Roads Analysis and Access Management Plan). Of interest here are the four most protective categories: in descending order, Primitive I, Primitive II, Semi-primitive Nonmotorized, and Semi-primitive Motorized. Since approximately 93% of the Forest is in a Primitive or Semi-primitive Nonmotorized category (Revised Plan, Figure B-4, p. B-30), one would naturally think that the Forest would be almost entirely non-motorized. But exactly the opposite is in fact true (see I.B.1. above). The explanation is that the seemingly most protective categories, Primitive I and II, allow some motorized use (Revised Plan, p. B-30) and are actually less protective than the Semi-primitive Nonmotorized category. Again, words don't mean what they say in the Revised Plan.

Similar problems exist in the FEIS. Figure 3-53c, for example (FEIS, p. 3-309), indicates that about 1,029,00 acres on the Kenai Peninsula and Turnagain Arm (out of 1,173,000) are in Primitive or Semi-primitive Nonmotorized categories, and that there are 11 times more Semi-primitive Nonmotorized acres than Semi-primitive Motorized—clearly suggesting to most people that these lands will be quiet and wild when, in fact, that is most definitely not the case (see I.B.1. above). On Table 3-54 (FEIS, p. 3-297), the Johnson Pass Trail, which is mostly motorized, is listed as the example of the Semi-primitive Nonmotorized category. Furthermore, ROS categories are used as Key Indicators for Recreation Settings in the Recreation and Tourism analysis, but without taking into account the failure of those categories to provide meaningful information on the non-motorized/motorized conflict, the most serious on the Forest (FEIS, p. 3-293; see also p. 3-349: “The recreation settings are discussed and displayed without reference to their motorized component”). The ROS categories become almost meaningless for the purpose of analyzing the important question of to what degree the Chugach will be managed for primitive as opposed to mechanized recreation.

B. The analysis of the individual and cumulative effects of motorized recreational vehicle use on the resources and uses of the Forest is inadequate and needs to be supplemented.

1. The effect of **summer cross-country ORV travel** (for example on the large block of land in the Copper River Delta that is open to such travel (Summer Motorized Recreation Access map)) on, for example, soils, vegetation, water quality, fish and wildlife habitat, and other users, is not addressed at all. There are all too many examples in Alaska of the dramatic and unacceptable adverse effects of cross-country ORV travel (for example, the Talkeetna Mountains and the Caribou Hills). The effects of such travel need to be assessed but, more importantly, the above block of land, if it is to be open at all, should be open only on designated trails.

2. The effect of summer ORV use on **soils** is inadequately addressed. For example, compaction on foot trails is mentioned (FEIS, p. 3-12), but not on ORV trails.

3. The analysis of the effects on **biodiversity** due to fragmentation and perforation from recreation and access management focuses on roads and trails and fails to take into account extensive cross-country snowmachine travel (FEIS, pp. 3-96, 3-97), and the cross-country ORV travel discussed above.

4. (For a discussion of the effects of motorized recreational vehicles on **wildlife** please see the appeal submitted by The Wilderness Society, which we incorporate herein by reference.)

5. The discussion of the effects of motorized recreational vehicle use on **non-motorized users** and others seeking quiet, such as home and cabin owners, is inadequate. For an issue that was one of the most important and controversial in the whole planning process (FEIS, p. 3-376), the effects discussion is woefully inadequate.

6. Just as the Revised Plan and FEIS failed to integrate the issue of **recreational conflicts** into their prescription descriptions and ROS discussions and analyses, the FEIS fails to consider conflicts in its discussion of Recreation Settings, and in particular the recreationist's goal to "have a positive experience" (FEIS, p. 3-294). Instead it defines recreation settings as "physical places" (Id.), in spite of the fact that the most desirable physical place can produce a highly undesirable recreational experience if conflicting uses are occurring at that place.

7. Although the Affected Environment segment of the FEIS, which devoted much of its discussion to existing and projected future user numbers, was quite lengthy (FEIS, pp. 3-293 - 3-346), a major flaw, as we suggested earlier, was its failure to adequately address the concept of **quality of experience**—and in particular **displacement**, both of users that formerly used an area but have been displaced by a conflicting use, and of those that would have used, or would use, an area except for the existence of the conflicting use (see II.C.1.)—and integrate it into demand analysis (FEIS, p. 3-324). The effects of

motorized recreational vehicle use on displaced users have not been quantitatively analyzed at all, nor adequately analyzed qualitatively (such as through a discussion of the existing literature). Furthermore, there is more discussion of the potential displacement of snowmachiners (FEIS, p. 3-376) than there is of past and future displacement of non-motorized users, and no recognition of the fact that there are millions of acres of state and federal public lands in Southcentral Alaska currently open (whether appropriately or not) to snowmachining.

There's at least one other reason why merely counting numbers of existing non-motorized recreationists isn't adequate in assessing their needs and in making land allocation decisions: the experience many non-motorized recreationists are seeking is a wilderness or quasi-wilderness experience—a critical characteristic of which is solitude, that is, seeing few other individuals. To conclude, for example, that if there are only a small number of backcountry skiers in an area that proves that it's not a very desirable one, and therefore that designating the area for motorized use will have few impacts, is exactly the wrong conclusion. The area might be desirable precisely because there are few users. The motorized designation might have an adverse impact on a relatively few number of people, but the impact on those individuals is a highly significant one.

8. The Environmental Consequences discussion relies too heavily, as the FEIS does elsewhere, on the ROS categories (ROS differences between the existing and revised plans is one of three "primary questions") (FEIS, p. 3-346). User conflicts are discussed separately, rather than integrated into this discussion of recreation settings.

9. The analysis of recreation conflicts is far too cursory. The discussion of individual effects for the Kenai Peninsula, for example, where the conflicts are very substantial, occupies just two pages (FEIS, p. 3-358). Additionally, it fails to mention the adverse effect of extensive snowmachine tracks on scenic snowscapes, a serious concern shared by many non-motorized recreationists. Furthermore, there is no discussion of the significant philosophical underpinnings to the non-motorized/motorized conflict.

As for Prince William Sound and the Copper River Delta, no mention is made of the conflict regarding heli-skiing and hiking, which certainly exists now and will only grow as the Chugach addresses new commercial permit applications that had been in limbo as a result of a litigation settlement agreement; nor are conflicts with jet skis or airboats discussed. The two-paragraph Prince William Sound individual effects conflicts discussion addresses only the management of the lands within a "weekend radius" of Whittier (FEIS, p. 3-367). The two-paragraph Copper River Delta individual effects conflicts discussion makes no mention of conflicts posed by motorized recreational vehicles.

In the very brief cumulative effects conflicts discussion (FEIS, p. 3-376 – 3-377), the major thrust is not so much the conflicts, but the presumed burden that will/would be placed on motorized recreation by limiting motorized access. Helicopter access in particular, and especially on the Delta, is discussed as if recreation would be exceptionally difficult if not impossible without their assistance. Heli-hiking also

receives special mention, as if this activity deserved significant deference. Overall, a substantial motorized bias is clearly evident, and insufficient attention and consideration is given to truly traditional, low impact, muscle-powered forms of recreation.

10. The **Cumulative Effects** analysis is also seriously deficient in addressing conflicts, even though it acknowledges that “winter recreation motorized and nonmotorized access was the biggest and most controversial situation addressed in alternative development” (FEIS, p. 3-376). There have been no studies on the Chugach relating to the impact of motorized vehicles (FEIS, p. K-18). Less than two pages, the cumulative effects analysis inaccurately assesses the current non-motorized/motorized opportunities by incorrectly describing the allocations in Chugach State Park, Kenai Fjords National Park, and the Kenai National Wildlife Refuge (see II.C.2. above); by failing to note that there are extensive open areas not only north but also east of Anchorage (FEIS, p. 3-376); and by indicating that the few non-motorized areas provided by the Revised Plan would complement a so-called, but unfortunately largely non-existent, “network” of non-motorized areas in Southcentral Alaska (Id.).

Additionally, there is no discussion of the level of motorized recreational vehicle use that might occur on various areas of the Forest, at different seasons of the year—or where, and at what level, motorized recreational vehicle use occurs on adjacent lands (except for the flawed attempt to describe snowmachine use on nearby lands).

11. The discussion of **helicopter skiing** and **hiking** is grossly inadequate, in spite of the fact that the cumulative effects discussion seems to promote these activities (FEIS, pp. 3-376 – 3-377) (see AQRC Comments, pp. 3-5).

12. There is no analysis of the effect of allowing heli-skiing in several areas closed to snowmachining, or of allowing snowmachining on ridgetops above such areas. High quality non-motorized areas need to be closed to **all** motorized recreational vehicle use.

13. A number of **allocation methods** are employed to try to deal with the conflicts created by motorized recreational vehicle use (see, e.g., the two motorized access maps), but nowhere is there any discussion of the pros and cons of these methods, and very little discussion of why particular ones were applied to particular areas.

14. There is no, or virtually no, discussion of the effects of **jet skis**, **airboats**, **jetboats**, other motorboats, and **fixed-wing airplane** landings and overflights, on non-motorized users.

15. Most of the discussion of winter terrestrial motorized recreational vehicle use refers to snowmachines. However, the FEIS notes that the Forest currently, “with few exceptions,” is open to **over-the-snow** machines, including most trails (FEIS, pp. 3-407, 3-408). Although the term is not defined in the Glossary, it presumably includes vehicles like four-wheelers. Four-wheelers can have substantially different effects than snowmachines, yet nowhere are those effects discussed. If areas open to winter terrestrial

recreational motorized vehicle use in the Revised Plan are also open to over-the-snow vehicles generally, this is a serious flaw.

16. According to the FEIS, "the most prized resource of the State of Alaska and the Chugach National Forest is its scenery" (FEIS, p. 3-415; and see Revised Plan, p. B-35, which notes that the viewing of scenery is a major recreation activity in and of itself on the Chugach, as well as a major component in the overall satisfaction of other activities). The FEIS generally suggests that the Revised Plan will have little adverse effect on the Forest's scenic beauty. Yet nowhere does it analyze the effects of cross-country summer ORV travel (such as on the Delta), or the extensive tracking of the snowscape by the snowmachining that is allowed on the great majority of the Chugach's lands. There are few landscapes more beautiful than a pristine snowscape—but there are few landscapes less beautiful than one that is covered with machine-made tracks for as far as the eye can see.

17. The FEIS fails to analyze the effects of the use of motorized recreational vehicles pursuant to ANILCA for either **subsistence** under Section 811, or **traditional activities** under Section 1110(a). It addresses possible restrictions on subsistence access (see, e.g., FEIS, p. 3-388), but not the extent of expected motorized use under these two sections or the effects of that use on other resources or users, including of course management actions that might be taken to reduce impacts.

18. Although some limited **monitoring** of the effect of the non-motorized/motorized recreation allocations on users is indicated, there seems to be no suggestion that other effects of motorized recreational vehicles will be monitored, and there is no discussion of the Forest Service's present **enforcement** capability or future plans.

The above flaws in the FEIS effects analysis require the preparation of a **Supplemental Environmental Impact Statement**.

Respectfully submitted,

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BY HCE, Jr

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December 14, 2000

Dave Gibbons, Forest Supervisor
Chugach National Forest Plan Revision
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Re: Comments on Chugach National Forest Draft Plan

Dear Dave:

The following are the comments of the Alaska Quiet Rights Coalition. AQRC, with over 600 members and supporters statewide, is dedicated to protecting the rights of Alaskans to quiet places for the benefit of public land users, home and cabin owners, communities, businesses, wildlife, visitors, and future generations. Our objective is a fair and balanced allocation of Alaska's public lands for both non-motorized and appropriate motorized use. We think Alaskans, visitors and future generations have the right to experience the natural sights, sounds, and quiet beauty of our state. Finally, we believe that in the vast majority of cases the obtrusive noise, exhaust, and dangers of motorized recreation are incompatible with non-motorized recreation and quiet homes and neighborhoods, and that motorized recreation must be separated from homes and other recreationists in either space or time.

Introduction. We have appreciated the opportunity to participate actively in the planning process, which could (with one important exception) be a model for national forest planning across the country (the exception being the unfortunate decision just before the final Preferred Alternative was released to largely ignore the bulk of the public comment and fail to recommend Copper River Delta wetlands as Wilderness).

We also appreciate the important first steps made in the Draft Plan (DP; we're using the terms Draft Plan and Preferred Alternative (PF) interchangeably) to restore natural quiet to the Chugach. Until just a relatively short while ago, natural quiet and the opportunity to hear and enjoy natural sounds were taken for granted. Robert Service's "stillness that fills me with peace" was a value that was recognized frequently in the hook and bullet magazines that I devoured in my youth.

These days, unfortunately, natural quiet has become a rarity. (It is especially sad and ironic that in a state that is perceived worldwide as one of the last great, wild places, natural quiet, unless one charters a plane (an irony in itself, I guess) to be carried far into the bush, can be even harder to find than in the tamer Wildernesses of the lower 48.) As a result, the loss of natural quiet has

become an increasingly important issue nationwide, and has resulted, for example, in the creation of a national coalition to address it, a coalition that includes local, regional, statewide and national groups. Some conservation organizations Outside are working as much or more on controlling motorized recreational vehicles than on efforts to have Wilderness designated because such unregulated use is making areas unsuitable for designation before they can even be fully evaluated by the agencies, or considered by the Congress.

Some may say they don't care how it's done Outside; we believe that we need to learn from experiences in the lower 48, whether it's about the tremendous resource damage that's occurring from ATV's in the California desert, Utah, and elsewhere, or the social and wildlife impacts from out-of-control commercial helicopter and fixed-wing flightseeing at the Grand Canyon and on the Hawaii coast (of course we have our own Alaska examples of the former in places like the wetlands of the headwaters of the Anchor River and Deep Creek on the Kenai Peninsula, the Caribou Hills on the Kenai, and the magnificent Talkeetna Mountains, and of the latter in Juneau and at Denali National Park).

Again, to its credit, the Chugach National Forest, after hearing from hundreds or thousands of people from Day 1 of the planning process that quiet is important to them, is taking valuable first steps in the DP to restore natural quiet to the Forest. We hope that these efforts will make the Forest truly a "land of many uses," not one which is largely unavailable to quiet recreationists.

Several provisions in the draft are precedent-setting for the national forest system as a whole. The plan explicitly recognizes natural quiet as an important natural resource that deserves consideration similar to what we give to, for example, fish and wildlife, air and water quality, and scenic beauty. It has created a new prescription, Developed Recreation/Reduced Noise, that looks at natural quiet issues from other than a purely motorized/non-motorized recreational standpoint. And it continues to employ a basically closed until open policy for ATV's, where ATV use is permitted only on roads, trails, routes or areas that are designated open. Finally, although other forests across the country have provided quiet winter recreation opportunities too (although probably mostly as a result of Congressional Wilderness designations), the Chugach DP, while it doesn't go far enough, makes not insignificant strides towards managing winter recreation in a fairer, more balanced way by restricting additional areas, through both full closures and time-shares, to snowmachines (and, actually, the proposed alternate year time-share for the Twentymile could also be a first for the system nationwide).

Unfortunately, the plan's consideration of natural quiet is badly flawed in two ways: it authorizes (subject to permit) far too many areas for commercial helicopter landings; and it fails for the most part to even address the regulation of two exceptionally noisy and irritating types of motorized vehicles: jet skis and airboats. If we can learn anything from experiences Outside, it's that jet skis create impacts for an unusually large number of people (in addition to their serious ecological impacts), and that it's a lot easier to manage them successfully before rather than after their use has become established.

Finally, the Quiet Rights Coalition generally focuses, and in these comments is focusing, on the social impacts of noisy recreational activities (including effects on scenic beauty). However, all of us are very concerned about the possible ecological effects of those activities, whether it's

impacts to fish, wildlife, air and water quality, soils, or vegetation. A fundamental but probably too often unexpressed premise of our work is that motorized recreational activities should be allowed only where they will have no more than relatively insignificant ecological effects. When we support opening areas to motorized recreational use we do so in the context of recreation management, not ecological suitability. In fact, we believe that one of the additional serious flaws in the Draft Plan and DEIS is the failure to adequately assess the ecological impacts of motorized recreational vehicle use. If more studies are needed (and they are), they should be undertaken before ecological damage is done, not after.

Some General Principles.

1. The Forest Service should proceed conservatively in deciding whether to allow or not allow motorized recreational vehicle use, considering its obviously substantial social impacts as well as the obvious or likely ecological impacts. The best way to do this is to consider the Forest closed to many such uses unless specifically opened. This, as a practical matter, is the policy for summer ATV's, a policy which, as we have said, we applaud. This should also be the policy for snowmachines—even if much of the Forest were to be opened. A closed until opened policy makes a valuable statement about the Forest Service's recognition of the seriousness of these issues and impacts. If the Service doesn't close the entire Forest to jet skis and airboats, as we believe it should, it should first close the Forest to these craft and then open only a very small number of areas where impacts would be relatively minimal. Finally, the permitting requirement probably has the effect of a closed until opened policy for commercial helicopter and fixed-wing airplane landings.
2. Opening areas to motorized vehicle use should be preceded by an adequate NEPA analysis, and openings should occur only if adverse environmental effects will be minimal.
3. Openings should occur only if adequate monitoring and enforcement can be guaranteed. Monitoring should answer two questions: are the rules being followed? and what level of damage is occurring from the motorized use (of course baseline information is needed to determine this)?

Commercial Helicopter (and other) Landings. We believe that this issue is a real sleeper, that is, that neither the public, nor probably the Forest Service, are fully aware of the likely substantial adverse effects of the huge amount of land that is authorized for commercial helicopter landings (subject to permit) in the PF. For example, 73% of the Forest on the Kenai Peninsula and Turnagain Arm, and 64% of the Cordova District, is authorized for winter landings. And the impression given by both the description of the Preferred Alternative and the summaries in the Revision Newsletter suggest that aircraft, both helicopters and fixed-wing airplanes, are being condoned if not encouraged as a primary means of visiting the forest (in addition, it is troubling to see that the newsletter says that the PF will "increase motorized uses adjacent to communities" in the Cordova District). We believe that this is dangerous and unwise. Furthermore, most land management agencies give far greater weight to commercial interests than is appropriate; in this case helicopter operations in particular appear to have been given a substantial preference when it comes to making decisions about land allocations for recreation and tourism. We urge you to seriously reassess these decisions.

Heli-skiing, heli-hiking, and flightseeing, whether by helicopter or fixed-wing airplane, can have tremendous impacts. Again, we'll address only the social ones. The noise impact from a person walking along a trail is almost non-existent, as a practical matter. The impact from cars and trucks on a road, or ORV's on a trail, spreads out over a wider radius, but since it's at ground level, if there are intervening topographical features screening can occur to lessen or eliminate the impact (ORV use off-trail is a much bigger problem; this is how, for example, snowmachines are frequently used, and how jet skis are used on a lake; the quiet recreationist can distance himself from a noise source that's confined to a fixed route, but not from one that can go anywhere). Helicopters and small planes are not only very loud, but the area of impact (and often there's no screening since the craft will be above the ridgelines) is very great; many square miles of terrain will be affected by an aircraft that's flying a roundtrip of 10, 20, 30 or more miles.

Helicopter noise in particular is especially annoying to most people, but we shouldn't underestimate the effects of small planes. Furthermore, a fairly small number of people, often relatively wealthy non-Alaskans, enjoy the benefits of heli-skiing, heli-hiking, and flightseeing trips while the substantial burden is borne by large numbers of Alaskans as well as visitors and wildlife. And we shouldn't confuse these activities, flightseeing in particular, with truly traditional uses of aircraft in Alaska. Until just very recently, small plane flights were far fewer in number and almost totally random, as people flew off in relatively small numbers to all points of the compass to cabins or to hunting camps or other recreational drop-off points. Today, the numbers have increased dramatically and the traffic on a relatively fixed route can be almost constant during the season of use (all summer long for flightseeing). These latter types of flights need to be managed much more carefully; instead of having maybe four or five small planes flying over any particular area in a day, the numbers now can go as high as 75 or more; the first is tolerable, the second is not.

Public land managers nationwide, because of jurisdictional problems, have had a nearly impossible time managing the very serious adverse impacts of overflights from helicopter and fixed-wing flightseeing on both on-the-ground users and wildlife. In fact, the Congress has had to step in to try to address these problems, with some, but limited, success (Alaska of course has not benefited from this legislation since our delegation has exempted our state from the benefits, apparently believing that it's still 1950 and that noisy motorized vehicles create conflicts everywhere else but not in Alaska).

Considering this, and the direct experience of conflicts we have in Alaska in places like Juneau and Denali, we should at least do an adequate job of managing those activities we can control, like landings—and of course not just of commercial helicopters but of commercial fixed-wing aircraft as well. This the plan does not do, and while the preparation of an EIS to address the issue in the future will presumably help, we shouldn't just, in effect, write off this planning process as an unnecessary exercise and put all our eggs in the EIS basket. We recommend in general that commercial helicopter landings should not be allowed on lands recommended as Wilderness in Alternative F; one specific recommendation that we can make at this time is that Jack and Sawmill bays should be quiet year round.

Of course there is more to the problem than the number of areas authorized for possible landings. A single very attractive area (like the Mendenhall Glacier) can generate a tremendous number of flights (at the present time, some 19,000 roundtrips to the Mendenhall, or 38,000 flights—and the operators would like to double that number). We need of course to control the number of flights as well as the number of areas authorized for landing. This will apparently be done in a subsequent EIS, but that leaves a critically important question up in the air after the plan is adopted.

Finally, there are lots of lakes available for floatplane landings, but many fewer lakes accessible by hiking trail. There is nothing more discouraging than taking several hours of substantial physical effort to backpack to a remote lake and set up camp, only to have a commercial floatplane or two land on the lake and unload a dozen sport fishers who have gone to no effort to get there. We recommend that at least some lakes at the end of popular hiking trails (like Bench and Johnson lakes) be closed to the landing of commercial floatplanes in order to provide backpackers with the reward they deserve (solitude and quiet) for their efforts.

Snowmachining. We will be devoting considerable space to our discussion of this issue, in part because winter recreation is so important to Alaskans, and in part because this question has arguably been, at least among the general public, the most controversial.

1. Snowmachining is incompatible with quiet recreational activities. Motorized/non-motorized conflicts, and the conflict created by snowmachines is one of the best examples, are exceptionally hard to deal with because the snowmachine community is generally unwilling to agree that there's a conflict. This is unlike many other land management situations where an industry, for example the oil industry, recognizes that there are adverse impacts from its activities, and the issue is whether the impacts are acceptable or can be reduced to an acceptable level.

But I know, I think you know, and virtually every land manager in the country knows, that snowmachining, unless one is dealing with only a very small number of riders in a very large area, is generally incompatible with quiet winter recreational activities like cross country skiing and snowshoeing, and displaces quiet winter recreationists. (And snowmachining, including activities at trailheads, can in addition deprive home and cabin owners of the quiet enjoyment of their properties.)

Consequently, it is irrelevant that, as far as the regulations are concerned, quiet recreationists can use 100% of the Forest if, as a practical matter, most accessible areas are de facto unavailable because of displacement. Similarly, it is no more "sharing" to ask quiet winter recreationists to use noisy areas and be satisfied than it is to ask non-smokers to eat in smoky restaurants, or ask churchgoers to tolerate a chainsaw salute. Sharing in the context of recreation management requires the separation of incompatible uses, either in time or space.

We of course believe that the Forest Service should acknowledge that there is a conflict; that it can only provide high quality winter recreation opportunities for both motorized and quiet recreationists if the two activities are separated; and that it has a responsibility, as a multiple use

manager, to manage its lands in a fair and balanced fashion by closing, either with full closures or time-shares, a reasonable number of areas to snowmachining.

2. The present management scheme is unfair and imbalanced. Unfortunately, the present management scheme on the Forest is grossly and unfairly imbalanced in favor of motorized winter use. Currently, only 1/10 of 1% of the Forest, and 1.3% of the Kenai Peninsula, is closed to snowmachining. In either case, clearly there are insufficient quiet winter recreation opportunities on the Chugach. And while the PF makes important strides towards redressing this gross imbalance, the theme for winter recreation should be balance, not "primarily...motorized."

This imbalance is a regional problem as well, one that the Chugach can play a role in resolving. In a 1996 study looking at over 34 million acres of relatively accessible state and federal public land in Southcentral Alaska, Alaska State Parks found that only 4.5% of those lands are closed to snowmachining. While Chugach State Park does a not unreasonable job of providing a balance of winter recreation opportunities (of the park's 10 or 11 winter accessible valleys, slightly more than half are open to snowmachining, slightly less than half are closed), on millions of acres of public lands to the north, south and east of Anchorage quiet areas are almost impossible to find. Even if the Chugach closed all of its useable acreage to snowmachining (something we are not advocating), there would still be more than ample opportunities available elsewhere.

3. Snowmachiners must be willing to give up some of their existing privileges. Because of the present situation on the Forest—its virtual takeover by snowmachiners as skiers have been displaced from all but a tiny number of areas—any efforts by the Service to correct this imbalance will result in "losses" to the snowmachine community, and in objections by snowmachiners. The Service has to be fully aware of this context in weighing the reasonableness of these objections, and of the snowmachiners "no net loss" policy.

4. Time-shares, where appropriate, are a fair way of truly sharing the resource. Furthermore, several of the proposed closures in the Preferred Alternative (PF) are not full closures but are instead timeshares (closed every other year, closed for half of the season, or closed after March 31). We question how reasonable it is to strenuously object when an area will be managed for one activity 50% of the time, and for the other activity 50% of the time.

5. Three day, four day time-shares are a bad idea. While we very much support the use in appropriate areas of split season or alternate year time-shares, we would find a three days off, four days on scheme extremely unsatisfactory. (This model, incidentally, from Eklutna Valley in Chugach State Park, is used only in the summer for ATV's that are allowed to ride on the road four days a week; it is not used in the winter when the valley is open to snowmachines every day.) On the great majority of the non-motorized days the area would still be totally tracked up with snowmachine tracks, which would result in not only a very unpleasant, and sometimes unsafe, skiing surface but also the loss of a once beautiful snowscape. Finally, although probably important to fewer people, the area would never be quiet for a full weekend, greatly reducing its value to people wanting to do a weekend trip.

An only somewhat less unsatisfactory time-share is a closure that goes into effect only after March 31, like the one proposed for the eastern Lost Lake area. We propose for Lost Lake a true split season, like the one that has been in effect for many years on the Resurrection Pass Trail.

Snowmachiners have suggested that time-shares aren't a good idea because there will occasionally be bad snow years when riding during the allotted period will be poor to non-existent. I haven't heard quiet winter recreationists raise this objection, probably because over the long haul both groups will be subjected equally to poor conditions as well as good ones.

We would like to point out a benefit of alternate year time-shares that some people might have overlooked in favoring split seasons instead. With split seasons, either one group never gets to recreate in the area during the most desirable season, spring, or the Forest Service would have to flip-flop the opening/closing every year (closed to snowmachines after 2/15 one year, closed before 2/15 the next). With an alternate year time-share, a person would be able to enjoy the spring season during each calendar year for which the area is managed for his or her preferred sport.

Finally, we do not believe that any of the current or proposed time-shares, or the sum of them, are so confusing that enforcement would be a problem. All of the PF's proposed time-shares could be easily described on about ½ side of an 8 ½ x 11 flyer that could be distributed to recreation clubs and sporting goods stores and posted at trailheads. Contrast this with the fish and game rule booklet, which is about an inch thick but which no one thinks is too complicated for effective enforcement.

6. Several of the responses to the opposition to the Twentymile and Lost Lake time-shares are disappointing. Much of the snowmachiners' most vocal opposition to the PF to date has been focused on the proposed changes to the management of the Twentymile and the eastern portion of Lost Lake—changes that would provide some of the best new winter recreation opportunities offered by the PF (in contrast, for example, to closures that have received no, or few, objections, like Kern and Peterson Creeks (important only to the relatively few people who fly to the head of the valleys, are dropped off, and ski down to the highway)). No one disputes that these spectacular areas are popular with snowmachiners, and that it would cause some pain to truly share them. But the fact that they're so beautiful is precisely why the fairest thing to do is to share them.

Several possible responses to the Twentymile opposition that the Service has suggested are disappointing. The first is abandoning the proposed alternate year time-share for a three day/four day scheme (see above).

Another is that a motorized corridor be established at the beginning of the valley (perhaps the first five miles) to get snowmachiners into the back of the valley while managing most of the mouth of the valley for quiet recreation. This addresses, for at least part of the valley, the problems created by a maze of snowmachine tracks across the valley floor and up and down the hillsides (the marring of the scenic beauty, and the unpleasant and sometimes unsafe skiing resulting from icy and uneven tracks), but it fails to redress, except minimally, the primary concern—noise. For the whole length of the corridor, the presumably unscreened snowmachine

noise would be audible. Such a lack of topographical screening, incidentally, has become an increasing problem at Turnagain Pass. Hearing the machines directly across the highway has always been a problem at Turnagain (which is why this area is not a good model for effective separation of incompatible activities), but in recent years, as highmarking has become more possible and more popular, the noise has carried even farther into the non-motorized side of the pass.

Incidentally, this response does raise an interesting question. Although we don't support the corridor idea for the Twentymile, has the Forest Service considered whether in other areas (not necessarily ones that would be managed primarily for quiet winter recreation), or for other purposes (protection of wildlife, for example), snowmachines should be restricted to trails? Isn't this how much snowmachine use is managed in the Midwest, for example? We believe this question deserves further analysis.

A third response is that since the valley is such a big one, not many skiers would be able to get all the way to the back of it but that lots of snowmachiners could, and that therefore it's more appropriate to manage it for snowmachines. We have several thoughts about that.

First, all of us know that at least some displacement of skiers (we believe a great deal) has already occurred on the Forest, although measuring its magnitude is at best difficult (a number of snowmachiners have said about their favorite areas that they hardly ever see any skiers there, so they don't know what the problem is; actually, of course, this is precisely the problem; snowmachine use conflicts with quiet recreation, so skiers generally avoid areas that are snowmachined, and are concentrated into ever smaller areas; we recommend that surveys be conducted to gauge the desire for quiet areas, rather than trying to count actual skier use—displaced skiers aren't there to be counted).

But if the Twentymile were closed to snowmachines on alternate years, and cross country skiers learned about this new opportunity in a beautiful valley, many more skiers would use it, and some of them would get way back, whether on day trips, over a weekend or long weekend, or for longer visits. This is what happens, paradoxically, to newly designated Wilderness areas, where the allure of the new designation as well as the increased publicity significantly increases use (and of course--and this is another paradox--the Service's interpretation of Section 1110(a) of ANILCA means that these quiet winter recreation opportunities can only be provided on the Chugach in areas not managed as Wilderness).

Perhaps more importantly, using a numbers test to determine management results in a situation where the Service would never provide precisely the experience most backcountry cross country skiers are seeking—one that is both quiet and relatively uncrowded (again, Chugach Wilderness would not provide this). Skiers seeking both solitude and quiet would never find it because only those areas heavily used by skiers would be deemed appropriate for snowmachine restrictions.

Another unfair result would be that too many of the big, beautiful, wild valleys would be managed for motorized recreation, and quiet recreationists would be relegated, if you'll excuse a bit of an exaggeration, to the tamest, dinkiest ones. One alternative that the Service has suggested for Lost Lake is finding an area in the general vicinity that could be managed just for

quiet winter recreation. But any such substitute would almost certainly be inferior to the Lost Lake area itself.

One alternative suggested for the Twentymile, however, would be reasonable—to go to a split season rather than alternate years. We believe that this is not as good a solution for snowmachiners, but if that's what they prefer it would be fine with quiet recreationists.

With regard to Lost Lake, we understand that the Forest Service is considering not providing any quiet winter recreation opportunities there because of the magnitude of the opposition (although it is of course a gross exaggeration to say that Lost Lake would be "lost" under the PF, as a widely distributed flyer claimed, since the closure would be for only a portion of the area, and would be in place only after March 31). Should the Final Plan withdraw that proposed opportunity at Lost Lake, it would take quite a bit to restore even the imperfect balance achieved in the PF. We believe that the most appropriate substitute would be restricting in some fashion the three additional areas (that is, ones that weren't restricted in the PF) for which the revision newsletter sought comment—Carter/Crescent lakes, Russian River trail, and Fresno Ridge.

7. Designating quiet areas is good for business. Some snowmachine tourism operators have said that their businesses will be harmed (ruined?) if areas on the Forest are closed to snowmachines. We doubt that businesses will be seriously impacted, especially in areas where the proposed restrictions are time-shares rather than full closures. In any case, though, even if the PF were to be fully implemented (and of course we very much hope that it will not be weakened) there would still be lots of places to take clients (including outside of the Forest): only 9.2% of the Kenai Peninsula would be closed under the PF. This is hardly onerous.

But we do acknowledge that providing high quality areas for snowmachining generates economic benefits. At the same time, providing high quality areas for quiet recreationists and other users of the Forest also generates economic benefits, as the owner of the Tidewater Lodge noted at the Seward public meeting. Managing the Forest in a fair and balanced fashion is good not only for the general public, both Alaskans and visitors, but also for the economy.

8. Possible changes benefiting snowmachiners. In addition to the sharing/concessions represented by time-shares, at least some quiet winter recreationists would be willing to consider two other ideas that might benefit snowmachiners: first, closing to skiers some areas that are open to snowmachining, like the west side of Turnagain Pass. (We're not sure that there is a truly logical reason for doing this, but the fact that no places are closed to skiers by regulation (as opposed to displacement) is perceived as unfair by snowmachiners.) And second, if it would mean that more areas would be available as split season timeshares to quiet winter recreationists, it would be reasonable to flip-flop open and closed halves, so that both groups would have the opportunity to use the area during the most desirable season—spring. (There's logic to allocating the season with the shortest days to snowmachiners since they can travel much farther in a shorter period of daylight, but the result in fact is that the most desirable season ends up being allocated to skiers.)

9. Wilderness management policy makes these administrative decisions even more important. In the lower 48, quiet winter recreation opportunities are provided in areas that have been

designated Wilderness by Congress, or that are being managed as Wilderness. Because of the Forest Service's interpretation of Section 1110(a), in particular its definition of traditional activities, lands managed as Wilderness on the Chugach don't receive that protection. If there is to be any relief at this time on the Chugach from the noise of recreational snowmachines, motorboats, and airplanes it will have to come from administrative prescriptions.

10. Additional recommendations for quiet recreation opportunities. Finally, we believe that the PF, while a good step in the right direction (if it isn't weakened), still fails to provide an adequate number of quiet winter recreation opportunities on the Forest, and will be even more clearly inadequate if the final plan is weakened. Our recommendations, then, serve two purposes: as stand alone recommendations, in order to create a fair and balanced scheme; and as alternative locations for quiet winter recreation management should the Service decide (which we hope it won't) to weaken any of the proposals in the PF.

We recommend, for places like Turnagain Arm and the Kenai Peninsula where conflicts are great, that opportunities be allocated 50-50 (a number of these of course as time-shares). Consequently, we propose the following areas for additional quiet opportunities. Please note again that in the revision newsletter the Seward District specifically asked for comment on three of them—Carter/Crescent lakes, Russian River Trail, and Fresno Ridge— (recognizing, we believe, as we do, that under the PF there are still relatively few high quality quiet winter opportunities on the southern portion of the Peninsula); we believe that these are good choices that provide options for people with different interests and skill levels (and one of the goals of winter recreation management should be not just to provide a reasonable number of both non-motorized and motorized opportunities, but a spectrum of opportunities for both groups). A number of these recommendations could be implemented with time-shares, although in other cases full closures would be more appropriate:

Johnson Pass Trail (north end) (a popular area easily accessible to Anchorage); Lost Lake (a more balanced time-share, like the one on the Resurrection Pass Trail, where the season is split evenly); Snow River (South Fork) (one of the most desirable areas for Seward residents); slope behind Summit Lake Lodge (popular with locals); Fresno Ridge; Carter/Crescent Lakes; Russian River Trail; Jack Bay; and Sawmill Bay (these last two would provide needed opportunities for Valdez residents, and should be non-motorized year-round).

4. Wilderness Management. We urge the Forest Service to prohibit recreational snowmachining and other recreational motorized vehicle use on Forest lands managed as Wilderness. We believe the Service is interpreting Section 1110(a) of ANILCA far too broadly. That provision creates a very narrow exception (subject to regulation) for certain motorized uses that would not otherwise be allowed in Wilderness, based on fundamental differences between Alaska and the other 49 states. Those fundamental differences are two. First, many parts of Alaska have no road access, and travel between villages is by boat, airplane, or snowmachine rather than by car. Using these vehicles not for recreation but for such necessary, functional travel is generally appropriate. Second, Alaska, unlike other states, still has a vital subsistence economy that the Congress worked very hard to protect.

But when it comes to recreational snowmachining off the Seward or Sterling highways, Alaska is no different than New Hampshire, Minnesota, or Montana. The snowmachiner walks out of his house, often in a city or large town, loads his snowmachine onto his trailer or the back of his truck, drives down the highway, unloads his machine at the trailhead, and spends a few hours or a day or two recreating. Why should Congress treat recreational snowmachining—including high-marking, and racing in circles or figure 8's on lakes and meadows—in Alaskan Wilderness areas any differently than in other states? Shouldn't Alaska Wilderness be, if anything, wilder—not tamer, noisier, more crowded, more mechanized, more artificial—than other places? Or are we resigned to an Alaska that is wild only in our memories? Logic, and sound public policy, support making some motorized vehicle exceptions (subject to reasonable regulation) for travel between villages and subsistence—but not for non-essential recreational purposes.

5. **ATV's (off snow).** Again, this is an area where the Forest Service deserves a lot of credit. The Chugach's management of ATV's, although certainly not perfect, might be better (from what I've heard) than that on any other western forest. Its policy of closed until designated open should be a model for the rest of the system, and for the BLM as well.

Of course there is nevertheless room for improvement. Except for exceptional circumstances, only roads, trails, and routes, not areas, should be eligible for designation. It will be an extremely rare situation where an area can be designated without incurring unacceptable resource damage, whether it's to soils, vegetation, fish, wildlife, or habitat. For example, Table C-3 suggests that two full polygons at Anderson-Double Bay would be available for ATV use. These areas include muskeg, and maybe other habitat, that is unsuitable for uncontrolled use. It should be made clear in the plan that travel will be allowed only on designated trails or routes.

Similarly, Table C-3 says that unvegetated sand dunes in the Boswell Special Access Area are open to ATV's. On what did you base your conclusion that there were no shorebirds nesting there, for example, that would necessitate a seasonal closure?

Table C-3 also says that in the West Delta North and South special access areas travel is allowed on designated routes only. We understand that there is at least some ATV use in those areas already, but that no routes have been designated. That use should not be allowed until routes are designated, which should be done only after a careful evaluation. We seriously question, incidentally, whether the Copper River Delta is a suitable location for ATV use, and recommend prohibiting them there.

Finally, none of these potentially damaging, or socially incompatible, motorized recreational uses should be allowed unless there are adequate resources for monitoring and enforcement (see above). We were pleased to hear that there will be two additional officers on the Forest for these purposes. Additionally, though, apart from routine monitoring and enforcement, what sort of systemic monitoring will occur? How will we know whether impacts from jet skis, ATV's, airboats, etc. are at acceptable levels? Do we know what our baseline looks like?

6. **Jet Skis.** These thrillcraft are an abomination. They are very noisy, and the variability of their noise makes them exceptionally annoying. They also pollute badly, and their use in shallow waters adds to the harm they do to fish and wildlife.

Jet skis should not be allowed on the Forest. For most purposes—except for the type of thrill that should be relegated to the racecourse, not the public lands—other watercraft that are far more appropriate, both motorized and non-motorized, can be used. At the very least, they should be controlled before their use gets totally out of hand, as it has in so many places throughout the country, and as is starting to happen in Alaska.

The Forest Service has said that it has no jurisdiction over watercraft on marine waters. We believe that it is mistaken, and that in fact it has both the authority and the responsibility to regulate these and other watercraft (please see the comments of Trustees for Alaska).

7. Airboats. Is there a noisier motorized vehicle? Perhaps, but airboats are incredibly, earsplittingly, loud. They, like jet skis, should be banned from the Forest, and other watercraft used instead. We understand that some Cordovans use them for moose hunting. If airboats are not banned entirely, as we believe they should be, their use should at least be limited to the moose hunting season. Such a limitation would help protect birds (and presumably other wildlife), and would provide social relief at least during much of that part of the year when the majority of individuals especially enjoy being outdoors. They should not, however, in any case be allowed out of the water channel and permitted to destroy riparian vegetation. Surely one Big Cypress is enough.

8. Developed Recreation/Reduced Noise. Once again, our compliments to the Forest Service for devising this precedent-setting prescription, which recognizes that the desire for natural quiet is shared by many individuals, not just backcountry non-motorized recreationists. Many people, perhaps families especially, frequently enjoy the Forest by getting out of the city for a weekend and staying at a developed campground. While certainly not wilderness, this can be a very enjoyable outdoor experience, vastly different from remaining in the suburbs or city. The generally natural surroundings and the relative quiet are important to many such campers; they do not want to substitute the noise of RV generators and boom boxes for the noise of automobiles and jet airplanes. The relative quiet of the campground is an important part of their experience (actually, just as the relative quiet resulting from no snowmachines in the backcountry is a big improvement even if jets are occasionally overhead). Just because all noise can't be eliminated doesn't mean that it isn't well worth it to eliminate as much as we can.

We were disappointed, however, that more campgrounds (or portions of campgrounds, like one or more loops, especially relatively isolated ones) weren't given this prescription. For example, no reduced noise campgrounds have been recommended for the Glacier District. We understand that the two campgrounds near Turnagain Pass see relatively little use. Designating one of these for reduced noise would seem to be reasonable, especially since relatively few people would be adversely affected. Finally, we recommend that either between now and the Final Plan decision, or as a subsequent step-down planning effort, the Forest Service explore with the public other possible locations for this prescription.

Finally, we also appreciate the use of this prescription for relatively small areas close to the highway to be managed for cross country skiing (like John's and Quartz creeks). This is an

additional recognition that natural quiet is important to lots of different forest users, and not just the most experienced backcountry recreationists.

Marine Waters. Recognizing the many appropriate motorized uses of the Forest's marine waters, we should nevertheless, as a long-term goal, explore ways to maximize natural quiet in some of these waters.

Least Noisy Technology. The best way to restore natural quiet to the Forest is to try to eliminate noise in as many areas as possible. Where that's impossible, however, we should at least try to minimize noise by requiring the use of the least noisy technology available. We've already made one such suggestion—banning jet skis and airboats, effectively requiring boaters to use less noisy and annoying watercraft, whether motorized or non-motorized. Additionally, for example, commercial fixed-wing operators could be required to use three-prop planes, and commercial helicopter operators could be required to use the quietest available helicopters.

Plan Evaluation. How should one evaluate how fair and balanced the plan is and how well it meets the needs of quiet recreationists and other lovers of natural quiet? Among others, the following methods could be used:

1. Percentage of the Forest/Kenai Peninsula (including Turnagain Arm) managed for non-motorized winter recreation?
2. Percentage of desirable Kenai areas managed for non-motorized winter recreation?
3. Number of acres managed for non-motorized winter recreation that are road accessible, avalanche free, and within 10 miles of a road?
4. Number of miles of road accessible non-motorized winter recreation trails?
5. Number of acres managed for non-motorized winter recreation adjacent to communities?
6. Percentage of communities with adjacent non-motorized areas, both winter and summer?
7. Number and percentage of campgrounds that are designated reduced noise?
8. Number and percentage of public use cabins that are designated reduced noise? that are in non-motorized prescription?
9. Number and percentage of state marine parks that are adjacent to non-motorized prescriptions?
10. Miles of PWS shoreline that are in non-motorized prescriptions?
11. By district, and for the forest as a whole, number and percentage of acres that are not open, and open, by prescription to private, and to commercial, fixed-wing, and helicopter, landings?

In conclusion, we appreciate the Forest Service's willingness to address head on these difficult and often emotional issues. The importance of restoring natural quiet and the opportunity to hear and enjoy natural sounds will only increase. Although there are some serious problems with the Draft Plan, and with Forest Service policy, the Chugach has nevertheless taken very significant first steps—which we believe the majority of the public supports and appreciates—in the management of motorized recreational vehicles and the many adverse impacts they can create if

*Chugach National Forest Plan Revision
Non-Motorized / Motorized Recreation Public Comment Analysis*

The Forest Service received over 33,000 comments on the Chugach National Forest Management Plan Revision. The public comments were compiled into a Microsoft Access database file entitled CHUGACH UPDATE, authored by Stephen Gilskey and dated December 26, 2000.

As the use of motorized recreational vehicles on public lands over the past 20 years has increased, questions continually arise regarding conflicts with other uses, safety concerns, and the effects on the land and wildlife. The purpose of this project is to gain some understanding of what the public feels concerning the use of motorized recreational vehicles on the Chugach National Forest. We looked at the public comments for both form letters and non-form letters from Alaskan and non-Alaskan individuals.

D) Summary

A) All Written Comments

Of all the form and non-form letters that expressed an opinion **80%** supported restrictions on snowmachines on the entire Chugach National Forest, **83%** supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm, **94%** supported natural quiet on the Chugach National Forest, **90%** supported restrictions on heli-skiing on the Chugach National Forest, **94%** supported restrictions on jet skis on the Chugach National Forest, and **92%** supported restrictions on airboats on the Chugach National Forest.

B) Non-Form Letters

Of all the non-form letters that expressed an opinion, **75%** supported restrictions on snowmachines on the entire Chugach National Forest, **67%** supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm, **100%** supported natural quiet on the entire Chugach National Forest, **94%** supported restrictions on heli-skiing on the Chugach National Forest, **100%** supported restrictions on jet skis on the Chugach National Forest, and **100%** supported restrictions on airboats on the Chugach National Forest.

Of the non-form letters sent by Alaskans that expressed an opinion **55%** supported restrictions on snowmachines on the Entire Chugach National Forest, **62%** supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm, **100%** supported natural quiet on the entire Chugach National Forest, **86%** supported restrictions on heli-skiing on the Chugach National Forest, **99%** supported restrictions on jet skis on the Chugach National Forest, and **100%** supported restrictions on airboats on the Chugach National Forest.

C) Form Letters

Almost **86%** of both Alaskan and non-Alaskan form letters expressing an opinion supported natural quiet and supported restrictions on snowmachining on the entire Forest, snowmachining on the Kenai Peninsula and Turnagain Arm in particular, and on heli-skiing, jet skis and airboats.

Of all the form letters, **88%** supported restrictions on snowmachines on the entire Chugach National Forest, **88%** supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm, **91%** supported natural quiet on the entire Chugach National Forest, **90%** supported restrictions on heli-skiing on the Chugach National Forest, **90%** supported restrictions on jet skis on the Chugach National Forest, and **90%** supported restrictions on airboats on the Chugach National Forest.

Of the form letters sent by Alaskans, **86%** supported restrictions on snowmachine on the entire Chugach National Forest, **86%** supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm, **88%** supported natural quiet on the entire Chugach National Forest, **86%** supported restrictions on heli-skiing on the Chugach National Forest, **86%** supported restrictions on jet skis on the Chugach National Forest, and **86%** supported restrictions on airboats on the Chugach National Forest.

II) Search Criteria

Six search topics were chosen on various motorized use issues, which include snowmachining on the entire Chugach National Forest, snowmachining on the Kenai Peninsula and Turnagain Arm, natural quiet, heli-skiing, jet skis, and airboats. Searches were conducted between August 2, 2002 and September 11, 2002. Using the Advanced Filter/Sort tool we were able to specify our search criteria and conduct various analysis on our search topics.

A) Non-Form Letters

Each search identified either comments from Alaskans or comments from non-Alaskans. Filling in the STATE category with *AK* or *Ak* or *Alaska* identified comments from Alaskans; these comments were reviewed and counted as Alaskan comments. Non-Alaskan comments were derived by not filling in the STATE category; this produced the total number of comments received on the search topic, both Alaskans and non-Alaskans. From this Alaskan comments were segregated and comments from non-Alaskans, STATE category left blank, were reviewed. A certain number of these comments contained information to identify the commenter as an Alaskan, either a phone number or a statement of how long they have been in Alaska. These comments were added to the search results of Alaskan comments and excluded from non-Alaskan comments. By filling in the ORGANIZATION_NAME category as "Is Null" we excluded comments from organizations. Eliminating form letters from non-form letters was achieved by filling in the FORM_TYPE category as "Is Null". Filling in the COMMENTS category allowed us to specify the search criteria.

- 1) Snowmachining on the entire Chugach National Forest;
 - Search Criteria by category for Alaskans - ORGANIZATION_NAME: Is Null; STATE: *AK* or *Ak* or *Alaska*; FORM_TYPE: Is Null; COMMENTS: *snowmachine* or *snowmobile*
 - Search Criteria by category for non-Alaskans - ORGANIZATION_NAME: Is Null; FORM_TYPE: Is Null; COMMENTS: *snowmachine* or *snowmobile*

- 2) Snowmachining on the Kenai Peninsula and Turnagain Arm;
 - Search Criteria by category for Alaskans - ORGANIZATION_NAME: Is Null; STATE: *AK* or *Ak* or *Alaska*; FORM_TYPE: Is Null; COMMENTS: *snowmachine* and *Kenai Peninsula*, *snowmobile* and *Kenai Peninsula*, *snowmachine* and *Turnagain Arm*, *snowmobile* and *Turnagain Arm*, *snowmachine* and *Twentymile*, *snowmobile* and *Twentymile*, *snowmachine* and *Lost Lake*, *snowmobile* and *Lost Lake*, *snowmachine* and *Resurrection Pass*, *snowmobile* and *Resurrection Pass*, *snowmachine* and *Johnson Pass*, *snowmobile* and *Johnson Pass*, *snowmachine* and *Snow River*, *snowmobile* and *Snow River*
 - Search Criteria by category for non-Alaskans - ORGANIZATION_NAME: Is Null; FORM_TYPE: Is Null; COMMENTS: *snowmachine* and *Kenai Peninsula*, *snowmobile* and *Kenai Peninsula*, *snowmachine* and *Turnagain Arm*, *snowmobile* and *Turnagain Arm*, *snowmachine* and *Twentymile*, *snowmobile* and *Twentymile*, *snowmachine* and *Lost Lake*, *snowmobile* and *Lost Lake*, *snowmachine* and *Resurrection Pass*, *snowmobile* and *Resurrection Pass*, *snowmachine* and *Johnson Pass*, *snowmobile* and *Johnson Pass*, *snowmachine* and *Snow River*, *snowmobile* and *Snow River*

- 3) Natural quiet on the Chugach National Forest;
 - Search Criteria by category for Alaskans - ORGANIZATION_NAME: Is Null; STATE: *AK* or *Ak* or *Alaska*; FORM_TYPE: Is Null; COMMENTS: *natural quiet*
 - Search Criteria by category for non-Alaskans - ORGANIZATION_NAME: Is Null; FORM_TYPE: Is Null; COMMENTS: *natural quiet*

- 4) Heli-skiing on the Chugach National Forest;
 - Search Criteria by category for Alaskans - ORGANIZATION_NAME: Is Null; STATE: *AK* or *Ak* or *Alaska*; FORM_TYPE: Is Null; COMMENTS: *heliski* or *heli-ski* or *helicopter skiing*
 - Search Criteria by category for non-Alaskans - ORGANIZATION_NAME: Is Null; FORM_TYPE: Is Null; COMMENTS: *heliski* or *heli-ski* or *helicopter skiing*

- 5) Jet Skiing on the Chugach National Forest;
 - Search Criteria by category for Alaskans - ORGANIZATION_NAME: Is Null; STATE: *AK* or *Ak* or *Alaska*; FORM_TYPE: Is Null; COMMENTS: *jet ski* or *jetski* or *personal watercraft* or *PWC*

- Search Criteria by category for non-Alaskans - ORGANIZATION_NAME: Is Null; FORM_TYPE: Is Null; COMMENTS: *jet ski* or *jetski* or *personal watercraft* or *PWC*
- 6) Airboats on the Chugach National Forest.
- Search Criteria by category for Alaskans - ORGANIZATION_NAME: Is Null; STATE: *AK* or *Ak* or *Alaska*; FORM_TYPE: Is Null; COMMENTS: *airboats* or *air boats*
 - Search Criteria by category for non-Alaskans - ORGANIZATION_NAME: Is Null; FORM_TYPE: Is Null; COMMENTS: *airboats* or *air boats*

B) Form Letters

We began by looking at the various form letters received and categorized by the Forest Service. A review of each form letter determined if the letter was in support of or opposed to our search criteria topics. Each search identified either comments from Alaskans or all comments from both Alaskans and non-Alaskans. Filing in the STATE category with *AK* or *Ak* or *Alaska* identified comments from Alaskans. Leaving the category blank identified all comments from both Alaskans and non-Alaskans. By filling in the ORGANIZATION_NAME category as "Is Null" we excluded comments from organizations.

- 1) Snowmachining on the entire Chugach National Forest;
- Search Criteria by category for Alaskans supporting snowmachine restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: E, I, L, Q, R
 - Search Criteria by category for all comments supporting snowmachine restrictions - FORM_TYPE: E, I, L, Q, R
 - Search Criteria by category for Alaskans opposing snowmachine restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: D, S
 - Search Criteria by category for all comments opposing snowmachine restrictions - FORM_TYPE: D, S

Form letters that do not address snowmachines on the Chugach National Forest: A, B, C, F, G, H, K, M, N, P, U, W, X, Y

- 2) Snowmachining on the Kenai Peninsula and Turnagain Arm;
- Search Criteria by category for Alaskans supporting snowmachine restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: E, I, L, Q, R,
 - Search Criteria by category for all comments supporting snowmachine restrictions - FORM_TYPE: E, I, L, Q, R
 - Search Criteria by category for Alaskans opposing snowmachine restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: D, S
 - Search Criteria by category for all comments opposing snowmachine restrictions - FORM_TYPE: D, S

Form letters that do not address snowmachines on the Kenai Peninsula and Turnagain Arm: A, B, C, F, G, H, K, M, N, P, U, W, X, Y

3) Natural quiet on the Chugach National Forest;

- Search Criteria by category for Alaskans supporting natural quiet - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: E, I, Q, R
- Search Criteria by category for all comments supporting natural quiet - FORM_TYPE: E, I, Q, R
- Search Criteria by category for Alaskans opposing natural quiet - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: D
- Search Criteria by category for all comments opposing natural quiet - FORM_TYPE: D

Form letters that do not address natural quiet on the Chugach National Forest: A, B, C, F, G, H, K, L, M, N, P, U, W, X, Y

4) Heli-skiing on the Chugach National Forest;

- Search Criteria by category for Alaskans supporting heli-ski restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: E, I, Q, R
- Search Criteria by category for all comments supporting heli-ski restrictions - FORM_TYPE: E, I, Q, R
- Search Criteria by category for Alaskans opposing heli-ski restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: D, S
- Search Criteria by category for all comments opposing heli-ski restrictions - FORM_TYPE: D, S

Form letters that do not address heli-skiing on the Chugach National Forest: A, B, C, F, G, H, K, L, M, N, P, U, W, X, Y

5) Jet Skiing on the Chugach National Forest; and

- Search Criteria by category for Alaskans supporting jet ski restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: E, I, Q, R
- Search Criteria by category for all comments supporting jet ski restrictions - FORM_TYPE: E, I, Q, R
- Search Criteria by category for Alaskans opposing jet ski restrictions - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: D, S
- Search Criteria by category for all comments opposing jet ski restrictions - FORM_TYPE: D, S

Form letters that do not address jet skiing on the Chugach National Forest: A, B, C, F, G, H, K, L, M, N, P, U, W, X, Y

6) Airboats on the Chugach National Forest

- Search Criteria by category for Alaskans supporting restrictions on airboats - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: E, I, Q, R
- Search Criteria by category for all comments supporting restrictions on airboats - FORM_TYPE: E, I, Q, R
- Search Criteria by category for Alaskans opposing restrictions on airboats - STATE: "AK" or "Ak" or "Alaska"; FORM_TYPE: D, S

- Search Criteria by category for all comments opposing restrictions on airboats -
FORM_TYPE: D, S
- Form letters that do not address airboats on the Chugach National Forest: A, B, C, F, G, H, K, L, M, N, P, U, W, X, Y

III) Duplicates and Omissions

We discovered a number of duplicate comments and deleted them from the totals. Comments sent by the same person were considered duplicates. Sorting last names in an ascending order alphabetically identified duplicate comments. Omissions were determined by reviewing the comments. These comments were either not related to the search criteria or were from organizations.

IV) Results

A) *Non-form Letters*

1) Snowmachining on the entire Chugach National Forest

The Forest Service received 1023 non-form letters that specifically addressed snowmachining on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan non-form letters). Of the total number of these non-form letters 592 were from Alaskans and 431 were from non-Alaskans. Of the 592 Alaskans, 203 favored restrictions on snowmachines and 163 people opposed restrictions on snowmachines, while 35 were omitted and 191 were duplicates. Of the 431 non-Alaskans, 345 favored restrictions on snowmachines and 23 people opposed restrictions on snowmachines, while 24 were omitted and 39 were duplicates. **Thus of all the non-form letters that expressed an opinion (734), 548 or 75% supported restrictions on snowmachines on the entire Chugach National Forest. Of the non-form letters sent by Alaskans that expressed an opinion (366), 203 or 55% supported restrictions on snowmachines on the Entire Chugach National Forest.**

2) Snowmachining on the Kenai Peninsula and Turnagain Arm

The Forest Service received 255 non-form letters that specifically addressed snowmachining on the Kenai Peninsula and Turnagain Arm (this is based on our search of all Alaskan and non-Alaskan non-form letters). Of the total number of these non-form letters 165 were from Alaskans and 90 were from non-Alaskans. Of the 165 Alaskans, 64 favored restrictions on snowmachines and 39 opposed restrictions on snowmachines, while 22 were omitted and 40 were duplicates. Of the 90 non-Alaskans, 23 favored restrictions on snowmachines and 4 opposed restrictions on snowmachines, while 57 were omitted and 6 were duplicates. **Thus of all the non-form letters that expressed an opinion (130), 87 or 67% supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm. Of the non-form letters sent by Alaskans that expressed an opinion (103), 64 or 62% supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm.**

3) Natural Quiet on the entire Chugach National Forest

The Forest Service received 356 non-form letters that specifically addressed natural quiet on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan non-form letters). Of the total number of these non-form letters 131 were from Alaskans and 225 were from non-Alaskans. Of the 131 Alaskans, 90 supported natural quiet and 0 opposed natural quiet, while 3 were omitted and 38 were duplicates. Of the 225 non-Alaskans, 203 supported natural quiet and 0 opposed natural quiet, while 2 were omitted and 20 were duplicates. **Thus of all the non-form letters that expressed an opinion (293), 293 or 100% supported natural quiet on the entire Chugach National Forest. Of the non-form letters sent by Alaskans that expressed an opinion (90), 90 or 100% supported natural quiet on the entire Chugach National Forest.**

4) Heli-skiing on the Chugach National Forest

The Forest Service received 70 non-form letters that specifically addressed heli-skiing on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan non-form letters). Of the total number of these non-form letters 36 were from Alaskans and 34 were from non-Alaskans. Of the 36 Alaskans, 20 supported restrictions on heli-skiing and 3 opposed restrictions on heli-skiing, while 2 were omitted and 11 were duplicates. Of the 34 non-Alaskans, 26 supported restrictions on heli-skiing and 0 opposed restrictions on heli-skiing, while 2 were omitted and 6 were duplicates. **Thus of all the non-form letters that expressed an opinion (49), 46 or 94% supported restrictions on heli-skiing on the Chugach National Forest. Of the non-form letters sent by Alaskans that expressed an opinion (23), 20 or 87% supported restrictions on heli-skiing on the Chugach National Forest.**

5) Jet skis on the Chugach National Forest

The Forest Service received 560 non-form letters that specifically addressed jet skis on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan non-form letters). Of the total number of these non-form letters 210 were from Alaskans and 350 were from non-Alaskans. Of the 210 Alaskans, 149 supported restrictions on jet skis and 1 opposed restrictions on jet skis, while 3 were omitted and 57 were duplicates. Of the 350 non-Alaskans, 324 supported restrictions on jet skis and 0 opposed restrictions on jet skis, while 2 were omitted and 24 were duplicates. **Thus of all the non-form letters that expressed an opinion (474), 473 or 100% supported restrictions on jet skis on the Chugach National Forest. Of the non-form letters sent by Alaskans that expressed an opinion (150), 149 or 99% supported restrictions on jet skis on the Chugach National Forest.**

6) Airboats on the Chugach National Forest

The Forest Service received 176 non-form letters that specifically addressed airboats on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan non-form letters). Of the total number of these non-form letters 134 were from Alaskans and 42 were from non-Alaskans. Of the 134 Alaskans, 82 supported restrictions on airboats and 0 opposed restrictions on airboats, while 10 were omitted and 42 were duplicates. Of the 42 non-Alaskans, 30 supported restrictions on airboats and 0 opposed restrictions on airboats, while 0 were omitted and 12 were duplicates. **Thus of**

all the non-form letters that expressed an opinion (112), 112 or 100% supported restrictions on airboats on the Chugach National Forest. Of the non-form letters sent by Alaskans that expressed an opinion (82), 82 or 100% supported restrictions on airboats on the Chugach National Forest.

B) Form Letters

Almost 86% of both Alaskan and non-Alaskan form letters expressing an opinion supported natural quiet and supported restrictions on snowmachining on the entire Forest, snowmachining on the Kenai Peninsula and Turnagain Arm in particular, and on heli-skiing, jet skis and airboats.

1) Snowmachining on the entire Chugach National Forest

The Agency received 1610 form letters addressing snowmachining on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan form letters). Of those form letters, 1554 were based on forms E, I, L, Q and R, of these 1158 were duplicates, leaving 396 form letters supporting restrictions on snowmachine. 56 of the form letters were based on forms D and S, which explicitly opposed restrictions on snowmachines. **Of all the form letters (452), 396 or 88% supported restrictions on snowmachines on the entire Chugach National Forest.**

The Agency received 695 form letters from Alaskans addressing snowmachining on the Chugach National Forest. Of those form letters 336 were duplicates, 310 Alaskans supported restrictions on snowmachines and 49 Alaskans opposed restrictions on snowmachines. **Of the form letters sent by Alaskans (359), 310 or 86% supported restrictions on snowmachine on the entire Chugach National Forest.**

Form letters A, B, C, H, K, M, P, U, W, X and Y did not address restrictions on snowmachines and form letters F and G were Forest Service comment sheets with varied responses that we did not count as form letters.

2) Snowmachining on the Kenai Peninsula and Turnagain Arm

The Agency received 1610 form letters addressing snowmachining on the Kenai Peninsula and Turnagain Arm (this is based on our search of all Alaskan and non-Alaskan form letters). Of those form letters, 1554 were based on forms E, I, L, Q and R, of these 1158 were duplicates, leaving 396 form letters supporting restrictions on snowmachines. 56 of the form letters were based on forms D, and S, which explicitly opposed restrictions on snowmachines. **Of all the form letters (452), 396 or 88% supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm.**

The Agency received 695 form letters from Alaskans addressing snowmachining on the Kenai Peninsula and Turnagain Arm. Of those form letters 336 were duplicates, 310 Alaskans supported restrictions on snowmachines and 49 Alaskans opposed restrictions on snowmachines. **Of the form letters sent by Alaskans (359), 310 or 86% supported restrictions on snowmachines on the Kenai Peninsula and Turnagain Arm.**

Form letters A, B, C, H, K, M, P, U, W, X and Y did not address restrictions on snowmachines and form letters F and G were Forest Service comment sheets with varied responses that we did not count as form letters.

3) Natural Quiet on the entire Chugach National Forest

The Agency received 1495 form letters addressing natural quiet on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan form letters). Of those form letters, 1445 were based on forms E, I, Q, and R, of these 949 were duplicates leaving 496 supporting natural quiet. 50 of the form letters were based on form D, which explicitly opposed natural quiet. **Of all the form letters (546), 496 or 91% supported natural quiet on the entire Chugach National Forest.**

The Agency received 688 form letters from Alaskans addressing natural quiet on the Chugach National Forest. Of those form letters 336 were duplicates, 309 Alaskans supported natural quiet and 43 Alaskans opposed natural quiet. **Of the form letters sent by Alaskans (352), 309 or 88% supported natural quiet on the entire Chugach National Forest.**

Form letters A, B, C, H, K, L, M, N, P, S, U, W, X and Y did not address natural quiet and form letters F and G were Forest Service comment sheets with varied responses that we did not count as form letters.

4) Heli-skiing on the Chugach National Forest

The Agency received 1501 form letters addressing heli-skiing on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan form letters). Of those form letters, 1445 were based on forms E, I, Q and R, of these 949 were duplicates, leaving 496 form letters supporting restrictions on heli-skiing. 56 of the form letters were based on forms D and S, which explicitly opposed restrictions on heli-skiing. **Of all the form letters (552), 496 or 90% supported restrictions on heli-skiing on the Chugach National Forest.**

The Agency received 694 form letters from Alaskans, addressing heli-skiing on the Chugach National Forest. Of those form letters 336 were duplicates, 309 Alaskans supported restrictions on heli-skiing and 49 Alaskans opposed restrictions on heli-skiing. **Of the form letters sent by Alaskans (358), 309 or 86% supported restrictions on heli-skiing on the Chugach National Forest.**

Form letters A, B, C, H, K, L, M, N, P, U, W, X and Y did not address restrictions on heli-skiing and form letters F and G were Forest Service comment sheets with varied responses that we did not count as form letters.

5) Jet skis on the Chugach National Forest

The Agency received 1501 form letters addressing jet skis on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan form letters). Of those form letters, 1445 were based on forms E, I, Q and R, of these, 949 were duplicates, leaving 496 form letters supporting restrictions on jet skis. 56 of the letters were based on forms D and S, which explicitly opposed restrictions on jet skis. **Of all the form letters (552), 496 or 90% supported restrictions on jet skis on the Chugach National Forest.**

The Agency received 694 form letters from Alaskans addressing jet skis on the Chugach National Forest. Of those form letters 336 were duplicates, 309 Alaskans supported restrictions on jet skis and 49 Alaskans opposed restrictions on jet skis. **Of the form letters sent by Alaskans (358), 309 or 86% supported restrictions on jet skis on the Chugach National Forest.**

Form letters A, B, C, H, K, L, M, N, P, U, W, X and Y did not address restrictions on jet skis and form letters F and G were Forest Service comment sheets with varied responses that we did not count as form letters.

6) Airboats on the Chugach National Forest

The Agency received 1501 form letters addressing airboats on the Chugach National Forest (this is based on our search of all Alaskan and non-Alaskan form letters). Of those form letters, 1445 were based on forms E, I, Q and R, of these 949 were duplicates, leaving 496 form letters supporting restrictions on airboats. 56 of the letters were based on forms D and S, which explicitly opposed restrictions on airboats. **Of the form letters (552), 496 or 90% supported restrictions on airboats on the Chugach National Forest.**

The Agency received 694 form letters from Alaskans addressing airboats on the Chugach National Forest. Of those form letters 336 were duplicates, 309 Alaskans supported restrictions on airboats and 49 Alaskans opposed restrictions on airboats. **Of the form letters sent by Alaskans (358), 309 or 86% supported restrictions on airboats on the Chugach National Forest.**

Form letters A, B, C, H, K, L, M, N, P, U, W, X and Y did not address restrictions on airboats and form letters F and G were Forest Service comment sheets with varied responses that we did not count as form letters.

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